

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

RENEA TURNER
2737 Woodthrush Road Springfield, Ohio 45502

Plaintiffs,

vs.

COX ENTERPRISES, INC
6205 Peachtree Dunwoody Road
Atlanta, GA 30328

and

COX MEDIA GROUP, INC.
6205 Peachtree Dunwoody Rd
Atlanta, GA 30328

and

1-100 ANY JANE & JOHN DOE(S), ANY XYZW-CORPORATIONS, LLCs, MEDIA, NETWORKS, BLOGS, NEWSPAPERS, NEWS CHANNELS, MEDIA GROUP'S, MEDIA CONGLOMERATE, MANAGEMENT COMPANIES, GLOBAL MANAGEMENT, INC, ENTERPRISES, INDEPENDENT, ONLINE AND MOBILE PROPERTIES, PARENTS, SUBSIDIARIES, DIVISIONS, INVESTORS, TELEVISION, NETWORK ONLINE. COMS, and or .ORG DIGITAL MEDIA COMPANIES and or GROUPS, CABLE NEWS NETWORKS, PRIVATELY HELD GLOBAL CONGLOMERATE, THIRD-PARTIES AND PARTNERS.

Name's and addresses unknown

Defendants,

TO THE HONORABLE COURT,

NOW COMES Renea Turner and states her Complaint for Defamation against all Defendants listed above

as follows:

INTRODUCTION

1. Apollo Global Management, Inc. Is a global alternative investment management firm. It invests in credit, private equity, and real estate assets. As of December 31st 2020 the company had \$455.5 billion Of asset under management. Among the most notable companies in which funds managed by the company have invested include Cox Media Group, Inc. On February 14th, 2019, Cox Media Group, Inc announced that it was selling its 14 television stations to Apollo. The Cox stations would be acquired for \$3.1 billion (To be reduced by the value of a minority equity stake in Terrier that will be retained by Cox Enterprise); On February 10th, 2020, Cox Enterprises, Inc bought back the Ohio newspapers it sold to AGM.
2. On February 10th, 2020, Cox Enterprise, Inc Announced it would repurchase the Dayton Daily News and Springfield News and Sun from Cox Media Group, Inc once again owning a 100% interest in the newspapers.
3. Cox Media Group, Inc owns, operates and provides sales and marketing services to 57 stations in 20 markets.
4. Apollo Global Management owns (71%) and Cox Enterprises, Inc owns (29%) of Cox Media Group, Inc.
5. Cox Media Group, Inc reaches 52 million Americans weekly with 100 plus news outlets.

PUBLISHED NEGLIGENTLY AND MALICIOUSLY

Cox Media Group, Inc, and Cox Enterprises, Inc, each along with the other # 1-100 ANY JANE & JOHN DOE(S), ANY XYZW-CORPORATIONS, LLCs, MEDIA, NETWORKS, BLOGS, NEWSPAPERS, NEWS CHANNELS, MEDIA GROUP'S, MEDIA CONGLOMERATE, MANAGEMENT COMPANIES, GLOBAL MANAGEMENT, INC, ENTERPRISES, INDEPENDENT, ONLINE AND MOBILE PROPERTIES, PARENTS, SUBSIDIARIES, DIVISIONS, INVESTORS, TELEVISION, NETWORK ONLINE. COMS, and or .ORG DIGITAL MEDIA COMPANIES and or GROUPS, CABLE NEWS NETWORKS, PRIVATELY HELD GLOBAL CONGLOMERATE, THIRD-PARTIES AND PARTNERS.

Defendants listed above.

DETAILED FACTUAL BACKGROUND

THE OCTOBER 22ND

1. On October 22nd, 2020 location was our Ohio Statehouse at 1 Capitol Square Columbus, Ohio. I was there Performing a declaration to alter the bands between the Ohio Governor Mike DeWine and Ohioan's due to Him being a Tyrant by violation of his Governor oath to protect Ohioans Constitutional rights. Along with committing several other felonies and crimes against Ohioans prior to and during the COVID-19 State shut down's and mandates in Ohio.

2. The videos went viral. The media was contacting me on October 23rd for comments. I had spoken with cleveland.com. My phone was ringing off the hook. I was receiving emails and instant messages through my Facebook and I responded to all of them.. That I would have a Press Release on Monday October 26th, 2020, at the Ohio Statehouse at 2 PM. This would allow all of the media sources to be on the same page.
3. During this time between October 23rd, 2020 to October 26th, 2020 the media went on a frenzy. They demonized me with comments stating that I was plotting to kidnap, kidnap and kill, kidnap and murder some stated that I was a Domestic Terrorist.. Different media sources a.k.a as Defendants in these cases use their own terminology. October 26th, 2020 I debunked all of the Demonizing media's Smear campaign and wrap up smear campaign. Reference: Nancy Pelosi stated on C-SPAN step-by-step how the Democratic process to Demonize Republicans by using a wrap up smear campaign. Which is exactly what they had done to me.
4. A Piqua man filed a false police report on October 16th, 2020, that I was unaware of until October 23rd, 2020. When The State Highway Patrol Investigative Unit told me. A state representative posted a video on YouTube About a meeting that we had in his office. That I was also unaware of until The State Highway Patrol Investigative Unit came to my home on October 23rd, 2020. Note: neither of those sources stated kidnap, kidnap and kill, kidnap and murder or calling me a Domestic Terrorist. The Defendants in these cases added those False, Demonizing and Defamatory Statements.
5. The False, Demonizing and Defamatory media went viral across the United States and in the UK.

CLAIMS FOR RELIEF

6. Published and Broadcast its False and Definitory Statements negligently and with actual knowledge of falsity or reckless disregard for the truth.
7. As some of the world's leading news outlets they knew but ignored the importance of verifying damaging and, in this case, incendiary accusations against Renea Turner an aspiring Politician.
8. Negligently Published and Broadcast its False and Defamatory Statements by departing from the reasonable standard of care employed by journalists, including those standard articulated by the society of professional Journalists Code of Ethics.
9. Negligently and Recklessly published and Broadcast its False and Defamatory Statements by failing to conduct a reasonable investigation prior to Publication of the scheduled press release.

10. Negligently and Recklessly Failed to consult public available information demonstrating its False and Defamatory Statements to be False including without limitations, Police report dated October 16, 2020, by a Piqua resident, video by state representative John Becker which they did add to their broadcast also Cleveland.com none of those stated Renea Turner was Plotting to Kidnap, kidnap and kill, kidnap and murder the Governor DeWine. They also did not call me a Domestic Terrorist. On October 23rd, 2020 Renea Turner stated via phone, emails and to all Media sources and on Social Media about a Press Release scheduled for October 26th, 2020, at 2:00 pm at The Ohio Statehouse. Renea Turner also stated the reason for the Press Release was to make sure all of the media had the facts to Publish and Broadcast.
11. Negligently and Recklessly Published and Broadcast its False, Defamatory endeavor in derogation of accepted principles of journalistic ethics, including by failing to use heightened sensitivity when dealing with an aspiring Politician.
12. Negligently and Recklessly Published and Broadcast its False and Defamatory and Demonizing Statements in derogation of accepted principles of journalistic ethics, including by failing to take special care not to misrepresent or oversimplify its coverage, and by failing to provide any appropriate context to its False and Defamatory and Demonizing Statements.
13. Negligently and Recklessly Published and Broadcast its False and Defamatory and Demonizing Statements in derogation of accepted principles of journalistic ethics, including by failing to treat Renea Turner as a human being deserving the respect.
14. Published its False and Defamatory and Demonizing Statements with common law malice, demonstrated by its failure to wait for the announced Press release and retract its False and Defamatory and Demonizing Statements despite the harm and danger they knew would be inflicted upon Renea Turner's personal life and Political Career.
15. Published its False and Defamatory and Demonizing Statements with common law malice, including because it callously ignored the consequences of its actions upon Renea Turner's personal life and Politician Career.
16. Actual malice is further evident or evident by its failure to actual malice is further evident by failing to conduct a reasonable investigation including by the Defendants themselves Cox Enterprises, Inc [EXHIBIT A] adding the words plot to kidnap for its publications and Cox Media Group, Inc [EXHIBIT B] display GOV. DEWINE KIDNAP PLOT on their broadcasts.

DAMAGES

17. The publications of the False, Defamatory and Demonizing Statements directly and proximately caused substantial and permanent damage to Renea Turner's Personal Life and Political Career.

18. The False and Defamatory and Demonizing Statements were republished by third-party and members of the mainstream and social media mob, which was absolutely foreseeable.
19. The False and Defamatory Demonizing Statements against Renea Turner are Defamatory per se, as they are libelous on their face without resort to additional facts, and as clearly demonstrated here, Renea Turner was subject to public hatred, contempt, scorn, obloquy, ridicule.
20. As a direct and proximate result of the False and Defamatory and Demonizing Statements, Renea Turner suffered permanent harm to both her personal reputation and Political profession.
21. As a direct and proximate result of the False and Defamatory and Demonizing Statements Renea Turner suffered severe emotional and mental distress.
22. As a direct proximate result of the False and Defamatory and Demonizing Statements Renea Turner is forced to live her life in a constant state of concern over her safety and the safety of her family.
23. The Defendants published False and Defamatory and Demonizing Statements with actual malice and common law malice, thereby entitling Renea Turner to an award of punitive damages.
24. The Defendant's conduct was outrageous and wilful, demonstrating that entire want of care that raises a conscious indifference to consequences.
25. Renea Turner is entitled to an award of punitive damages to punish the Defendants and to deter them from repeating such egregiously unlawful misconduct in the future.

WHEREFORE, Renea Turner respectfully prays:

- (a) That judgment be entered against The Defendants for substantial compensatory damages in an amount not less than Three Hundred Million Dollars (\$300,000,000.00);
- (b) That judgment be entered against The Defendants for punitive damages in the amount not less than Seven Hundred Million Dollars (\$700,000,000.00);
- (c) That if and when Renea Turner is forced to hire an attorney the defendants pay fees and expenses.
- (d) That all cost of this action be taxed to the defendants; and
- (e) That the Court grant all such other and further relief that the court deems just and proper, including equitable relief.

JURY DEMAND

Now comes Plaintiff, by Pro Se, hereby demand a trial by jury on all issues in this matter.

Respectfully submitted this 20th day of October, 2021.


Pro Se Renea Turner

Renea Turner 10-20-21

Pro Se
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